

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2012

Docket No. N2012-1

NEWSPAPER ASSOCIATION OF AMERICA COMMENTS ON NATIONAL  
NEWSPAPER ASSOCIATION MOTION TO COMPEL THE POSTAL SERVICE TO  
PRODUCE A WITNESS ON WITHIN COUNTY SERVICE MEASUREMENT  
(March 19, 2012)

The Newspaper Association of America (“NAA”) respectfully submits these comments in support of the motion of the National Newspaper Association to compel the Postal Service to produce a witness to attest to policy on Within County service measurement.<sup>1</sup>

In a proceeding in which the Postal Service is proposing to reduce service standards for Within-County mail, requiring it to provide record evidence as to the quality of the service provided compared to current service standards is hardly unreasonable. Without such evidence, there is no real basis upon which the Commission can evaluate the consequences that may follow from reducing the currently unmet standards still further.

The Commission has repeatedly urged the Postal Service to develop, as required by the Postal Accountability and Enhancement Act, a method by which

---

<sup>1</sup> *National Newspaper Association Motion To Compel the Postal Service To Respond To NNA/USPS T1-12 And T1-13 And To Produce A Witness To Attest To Policy On Within County Service Measurement* (filed Mar. 14, 2012). NAA does not at this time address that portion of the motion regarding the production of the IBM report of service standards, which NAA believes was filed on July 9, 2010, in Docket No. RM2010-11, but does believe that the Postal Service should be capable of answering questions regarding that report in this docket.

Periodicals Within-County service performance may be measured.<sup>2</sup> Waivers have allowed the use of Outside County as a temporary proxy, as well as the use of Red Tag and Del-Trak data.<sup>3</sup> Those waivers, however, hardly justify the Postal Service taking the position in this proceeding that the public interest could be served, and the policies of the postal law advanced, by reducing Within-County Periodicals service when it has absolutely no idea what service quality Within-County currently receives.

Accordingly, NAA supports the NNA motion.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: /s/ William B. Baker  
William B. Baker  
WILEY REIN LLP  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 719-7255

Certificate of Service

I hereby certify that I have this 19<sup>th</sup> day of March, 2012, caused to be served the foregoing document upon the United States Postal Service and the Office of the Consumer Advocate in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker  
William B. Baker

---

<sup>2</sup> E.g., Order No. 745, Dockets Nos. RM2011-1, RM2011-4, and RM2011-7 (June 16, 2011); Order No. 465, Docket No. RM2009-11 (May 25, 2010).

<sup>3</sup> NAA is unaware of any information of more recent vintage that the IBM report filed in Docket No. RM2010-11 regarding these matters.